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FRESNO, CALIF.**

Matt Scroggins
Senior Water Resource Control Engineer
Regional Water Quality Control Board
1685 "E" Street
Fresno, CA 93706

Subject: Comments to the Tentative Renewal of Waste Discharge Requirements, National Pollutant Discharge Elimination System Permit No. CA0079545, for Southern California Edison's Big Creek Powerhouse No. 1 Domestic WWTP

Dear Mr. Scroggins,

With this letter, Southern California Edison (SCE) provides requested comments to the Tentative Waste Discharge Requirements, National Pollutant Discharge Elimination System Permit No. CA0079545 (Tentative Permit), for Big Creek Powerhouse No. 1 Domestic Wastewater Treatment Plant (Plant), and the corresponding Time Schedule Order (TSO). SCE has the following comments and suggestions regarding the Tentative Permit.

1. In order to create uniformity and avoid confusion during implementation of the order, SCE requests that the term "adoption date" be substituted with "effective date" throughout the order. SCE therefore requests all time schedules be based on the effective date of the order.
2. The final effluent limits in Table 6 of the proposed permit for copper, lead, and zinc differ significantly from the proposed effluent limits as discussed and provided in *Table 1- Proposed New Effluent Limitations* of your letter dated November 8, 2011 (see below). SCE suggests replacing the Effluent Limitations in the Tentative Permit with the Effluent Limitations identified in the Board's November 8, 2011 letter, as shown below:

Constituent	Average Monthly Value In Nov 8 Letter	Average Monthly Value in Proposed Permit
Copper (µg/L)	1.5	0.55
Lead (µg/L)	0.25	0.053
Zinc (µg/L)	16	6.4

3. The TSO is not directly referenced in the proposed permit. SCE requests that the TSO be listed as an interim effluent limitation in *Section IV, Effluent Limitations and Discharge Specifications* within the permit to clarify the approval of additional time allowed to comply with the effluent limitations.
4. In the TSO, *Section 11, Interim Effluent Limitations Calculation Summary*, the nitrate + nitrite (as N) maximum daily value is believed to be too low. Most of the nitrate samples taken

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recently, and especially since the Plant was started back up were above the limit and tested in Nitrate (as NO₃). Although this is relevant to nitrate (as N), it is uncertain if those values would have been higher if tested analytically as nitrate + nitrite (as N). The infeasibility report asked for a limit of 15 mg/L for nitrate + nitrite (as N), but now that more data has been collected and analyzed, SCE is concerned that this may be too low. SCE requests an interim average maximum effluent limitation of **25 mg/L of nitrate + nitrite (as N)**. See the table below for effluent data from the analysis of the Plant since the Plant was recently started up.

Date	Nitrate (as NO ₃)	Nitrate + Nitrite (as N)	Nitrate (as NO ₃) = [Nitrate + Nitrite (as N)] / 4.427
12/07/11	55.0		12.42
12/14/11	54.0		12.20
12/21/11	29.0		6.55
12/28/11	46.0		10.39
01/06/12	37.0		8.36
01/11/12	51.0		11.52
01/18/12	72.0		16.26
01/27/12	39.0		8.81
02/01/12	13.0		2.94
02/08/12	42.0		9.49
02/15/12	77.0		17.39
02/22/12	71.0		16.04
02/29/12	50.0		11.29
03/07/12	66.0		14.91
03/14/12	56.0		12.65
03/21/12	35.0	7.9	
03/28/12		12.0	
04/04/12	39.0		8.81

5. SCE requests an effective date of 120 days after permit adoption to ensure sufficient time to comply with the new requirements. SCE will require time for developing monitoring plans, making changes in operation and maintenance schedules providing training and budgeting.
6. SCE requests the Board's guidance on the 2-hour notification threshold for "endangerment of health or the environment." The definition of the term "endangerment of health or the environment" appears ambiguous. SCE requests specific triggers for "endangerment of health or the environment" rather than a subjective measure that may be open to interpretation. Edison also requests an 8-hour notification limit due to the remote area of the Plant. All catastrophic emergencies will be reported as required.
7. SCE requests a dilution factor greater than one for chronic toxicity monitoring. This is very restrictive and does not mirror other plants in California.

Additionally, SCE would like to point out that *Section VI, C, 4, c Turbidity Operational Requirements*, provides a limit of "0.2 NTU more than 5 percent of the time within a 24-hour period, and 0.5 NTU at any time". The Plant is configured with a three-way valve that switches the discharge to the overflow pond if the turbidity rises above 1.0 NTU. SCE will modify this switch to 0.2 NTU so that there is never a discharge to the effluent discharge point EFF-01 of

wastewater with high turbidity. However, the Plant records the turbidity continuously and will not differentiate between when the Plant is discharging to the overflow pond and when the Plant is discharging to EFF-01. In the *Monitoring and Reporting Program, Section X, B, 8*, the Plant is able to show major shut downs and start ups and when the operators manually transfer effluent discharge to the overflow basin, but SCE is not able to monitor every time the Plant discharges to the overflow basin when the turbidity is over the effluent limit set by the operators. It is provided that whenever the turbidity is over the effluent limit, the effluent is not discharged at discharge point EFF-01; but rather, diverted to the overflow pond. SCE is proposing to add a flow meter to discharge point EFF-01 to demonstrate instances of flow/ no flow at this point. Budgeting and planning for this change are in process. SCE has a goal of installing the flow meter within the next year. Attached to this letter is an updated flow chart for the Plant demonstrating the three-way valve configuration.

Please call Mr. Michael J. Murphy at (559) 893-2033 with any comments or questions on the above information.

Sincerely,

A handwritten signature in cursive script that reads "Dave Dormine". The signature is written in black ink and is positioned below the word "Sincerely,".

BIG CREEK WASTEWATER TREATMENT PLANT FLOW SCHEMATIC

LEGEND

MOV	MOTOR OPERATED VALVE
ALUM	ALUMINUM SULFATE (PHOSPHOROUS REMOVAL)
NaOH	SODIUM HYDROXIDE (pH CONTROL)
NaOCl	HYPOCHLORITE (MEMBRANE RECOVERY CLEANS)

